

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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AMKOR TECHNOLOGY, INC., a Delaware Corporation,

Case No. 02-3156

Plaintiff/Petitioner,

**DECLARATION OF  
THOMAS A. LEGHORN**

v.

ALCATEL BUSINESS SYSTEMS, a French Corporation,  
ASSURANCES GENERALES DE FRANCE IART, a  
French Corporation, and ALCATEL  
MICROELECTRONICS N.V., a Belgian corporation.

Defendants/Respondents.

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THOMAS A. LEGHORN, an attorney, declares that the following statements are true and correct under the penalty of perjury:

1. I am a member of WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, attorneys for the defendants ALCATEL BUSINESS SYSTEMS (hereinafter "ABS"), and ASSURANCES GENERALES DE FRANCE IART (hereinafter "AGF"), as such, I am fully familiar with the facts and circumstances of the within motion.

2. I submit this Declaration in further support of the defendants' motion to dismiss the complaint filed by AMKOR TECHNOLOGY, INC., a Delaware Corporation (hereinafter "AMKOR") pursuant to Fed. R. Civ. P. 12(b)(2) for lack of personal jurisdiction and Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief can be granted and/or pursuant to the doctrine of *forum non conveniens*.

3. Annexed hereto and made a part hereof as Exhibit A is a true and correct copy of the complete transcript of the deposition of Dominique Castel taken on June 25, 2003.

4. Annexed hereto and made a part hereof as Exhibit B is a true and correct copy of the complete transcript of the deposition of Herve Karabadajakian taken on June 25, 2003.

5. Annexed hereto and made a part hereof as Exhibit C is a true and correct copy of the complete transcript of the deposition of Sylvie Lallement taken on June 26, 2003.

Dated: White Plains, New York  
July 31, 2003

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Thomas A. Leghorn